

**UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**FILED  
IN CLERKS OFFICE**

Albert William Bleau Jr.

2006 MAR 10 A: 9:46

Plaintiff

**U.S. DISTRICT COURT  
DISTRICT OF MASS.**

vs.

Civil Action  
No. 04 – 10469REK

Greater Lynn Mental Health  
& Retardation Association, et al,

Defendants

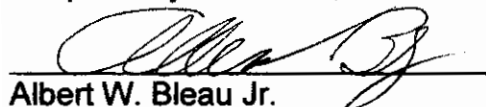
**DOCUMENTS REQUESTED FROM BRIDGEWELL, INC (GREATER LYNN  
MENTAL HEALTH & RETARDATION ASSOCIATION, INC & EASTERN  
MASSACHUSETTS HOUSING CORPORATION), PURSUANT TO RULE 34,  
FEDERAL RULES OF CIVIL PROCEDURE**

Plaintiff Albert W. Bleau Jr. respectfully requests that you are commanded to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below.

See attached list of requested documents.

Place: 441 Broadway, Lynnfield, Massachusetts

Respectfully submitted,



Albert W. Bleau Jr.  
505 Paradise Rd. #208  
Swampscott, MA 01907  
(781) 962-2662

Dated: March 10, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon defendants GLMHRA, et. al by first class mail on March 10, 2006



**Attachment to Federal Rule 34**

**Albert W. Bleau Jr., Plaintiff**  
505 Paradise Rd. #208  
Swampscott, MA 01907  
(781) 962-2662

Case Number: No. 04 - 10469-REK

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MENTAL HEALTH & RETARDATION ASSOCIATION, INC & EASTERN  
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FEDERAL RULES OF CIVIL PROCEDURE**

1. Copies of all audits prepared by Mullen & Company, Demakis and Demakis and any other outside auditing firm from fiscal years ending June 30<sup>th</sup>, 2000 to June 30<sup>th</sup>, 2005 and the six month financial statement ending December 31, 2005 including a detailed summary of all federal funds received by the defendants for fiscal years 2000, 20001, 20002, 20003, 2004 AND 2005.
2. Copies of all inter-fund financial transactions between GLMHRA and EMHC and GLMHRA program accounts and the GLMHRA EFIP for fiscal years ending June 30<sup>th</sup>, 1999 to June 30<sup>th</sup>, 2005 and all transactions from July 1, 2005 to December 31, 2005 and records and meeting notes, and contracts pertaining to the EFIP.
3. Copies of the Uniform Financial Report (UFR) with attachments filed with the state for each of the fiscal years ending June 30<sup>th</sup>, 2000, 2001, 2002, 20003, 200 and 2005.
4. Copies of the PC 15 filed with the Charitable Division of the Attorney General's Office and the annual reports filed with the Secretary of State for the fiscal years ending June 30<sup>th</sup>, 1998, 1999, 2000, 2001, 2002, 2003 2004 and 2005 including the IRS 990's.
5. Copies of all Board of Director meeting minutes, committee minutes, and meeting minutes from August 1, 1999 to March 1, 2006.
6. Copies of the by-laws and all amendments for GLMHRA and EMHC from 1978 to March 1, 2006.
7. Summary and copies of all resumes and applications for the Executive Director's position filled in the fall of 2003.

8. Names and addresses of all board members, employees and consultants who were involved in the screening and hiring process of the former executive director, Paul Coty and of the current Executive Director with copies of all notes, written comments and minutes of all meetings and emails.
9. Copy of the written response to Plaintiffs October 28, 2003 EEOC complaint and copies of any and all correspondence, attachments and e-mails from the Defendants and from Attorney Larry Donoghue to the EEOC and the MCAD since October 28, 2003.
10. Copies of the Personnel practices and all amendments from August 1, 1999 to March 1, 2006
11. Detailed accounting of the EFIP Reserves for the fiscal years 1998, 1999, 2000, 2001, 2002, 2003
12. Copies of all contracts, bills, and copies of all checks to Attorney Robert Griffin & to the Firm of Krokidas and Bluestein, to Attorneys Roderick MacKleish and Robert Sherman and to the firm of Greenberg & Traurig from January 1, 1999 to March 1, 2006.
13. Copies of all legal bills and consultant bills paid by the Defendants from August 1, 1999 through March 1, 2006
14. Copies of all bills submitted by Krokidas & Bluestein and Attorney Robert Griffin for legal services for Albert W. Bleau Jr., Court Appointed Receiver, for AGH from 1988 to 1992 and copies of all auditing bills submitted by Mullen & Company for the AGH Receivership.
15. Copies of all files, proof of payment from GLMHRA and/or EMHC for representation by Roderick MacKleish of Albert W. Bleau Jr., specifically liability law representation concerning a lawsuit against the Plaintiff involving the Tewksbury ICF from 1983 – 1990 and other similar work on behalf of the Plaintiff through September 1999.
16. Copies of all contracts, payments and professional relationships, correspondence, and e-mails with Paul Coty, former CEO of GLMHRA & EMHC from January 1, 2000 to March 1, 2006.
17. Copies of all Defendant's reports, e-mails, correspondence, meeting notes and phone logs, to and from the State Attorney General's Office, Attorney Robert Griffin, Attorney Roderick MacKleish, Attorney Robert Sherman, the Perkins Consultant Group and any and all consultants contracted by the Defendants from January 1, 2000 to March 1, 2006 and to and from any state agency including but not limited to the Department of Mental Retardation and the Department of Mental Health and any of their staff, counsel, consultants

or auditors that pertain to any Defendant in this complaint or to the Plaintiff or to the character, competence or disability of the Plaintiff from January 1, 2000 to March 1, 2006.

18. Copies of all Defendant's reports, e-mails, correspondence, meeting notes and phone logs to and from Attorney Robert Sherman and Wayne Godlin of Van Kampen Advisors, Inc., representatives from the Bond Department at State St. Bank including but no limited to Chuck Procknow and Mullen & Company staff including Partners James Mecone and John Sanella from January 1, 1999 to March 1, 2006.
19. Copies of all staff meeting notes, dates and times of meetings, correspondence, emails and phone logs to and from any Defendant in this complaint and to and from employees, consultants, family members, elected and appointed state and local officials and vendors that pertain to any Defendant in this complaint or to the Plaintiff or to the character, competence, or disability of the Plaintiff from January 1, 2000 to March 1, 2006.
20. Copies of all staff meeting notes, dates and times of meetings and phone calls, correspondence, emails and phone logs to and from any Human Service Agency or employer or individual inquiring about Plaintiff's work history, employment, character, competence or disability at GLMHRA and EMHC from January 1, 2000 to March 1, 2006.